

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Janet Connolly, Special Agent with the Department of Homeland Security, Homeland Security Investigations, being duly sworn, depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with United States Department of Homeland Security (“DHS”), Immigrations and Customs Enforcement, Homeland Security Investigations (“HSI”), and am assigned to the office of the Special Agent in Charge, Boston, MA. I have been an agent of HSI since 2008. As part of my duties, I am authorized to investigate violations of the laws of the United States, including criminal violations relating to child exploitation, child pornography, coercion and enticement, and transportation of minors, including but not limited to violations of 18 U.S.C. §§ 2422, 2423, 2251, 2252, and 2252A. I have received training in the investigation of child pornography, child exploitation, and transportation of minors, and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256). In my over four years of investigating these types of cases, I have participated in numerous investigations involving child exploitation and/or child pornography offenses.
2. I submit this affidavit in support of a criminal complaint charging DAVID ST. GEORGE, YOB 1946, of Arlington, MA (“ST. GEORGE”), with one count of possession of child pornography with intent to view under 18 U.S.C. § 2252A(a)(5)(B) and one count of receipt of child pornography in violation of 18 U.S.C. § 2252A(a)(2)(A).
3. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses, including, in particular, the Kent (United Kingdom) Police and the Arlington (Massachusetts) Police Department. Because this affidavit is submitted for the limited purpose of securing authorization for a criminal complaint, I have not included every fact

known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the foundation for the criminal complaint.

### **STATEMENT OF PROBABLE CAUSE**

#### **A. Issuance of the Search Warrants**

4. Based in part on the following information, on September 21, 2018, the Honorable Judith G. Dein, United States Magistrate Judge, authorized search warrants, docketed as 18-MJ-5100-JGD and 18-MJ-5101-JGD, to search XX XXXXX XX, Arlington, MA (the “SUBJECT PREMISES”) and the person of ST. GEORGE for evidence, fruits and instrumentalities of violations of 18 U.S.C. § 2252A.
5. In May 2018, HSI Boston’s Cyber Crime and Child Exploitation Group received an investigative referral from the HSI Cyber Crimes Center (“C3”) concerning an online storage account containing suspected child pornography that appeared to belong to an individual residing at the SUBJECT PREMISES.
6. According to HSI C3, on or about March 23, 2018, or shortly thereafter, the Kent (United Kingdom) Police (“Kent”), in the course of its own investigative work involving child pornography, accessed the following URL link:

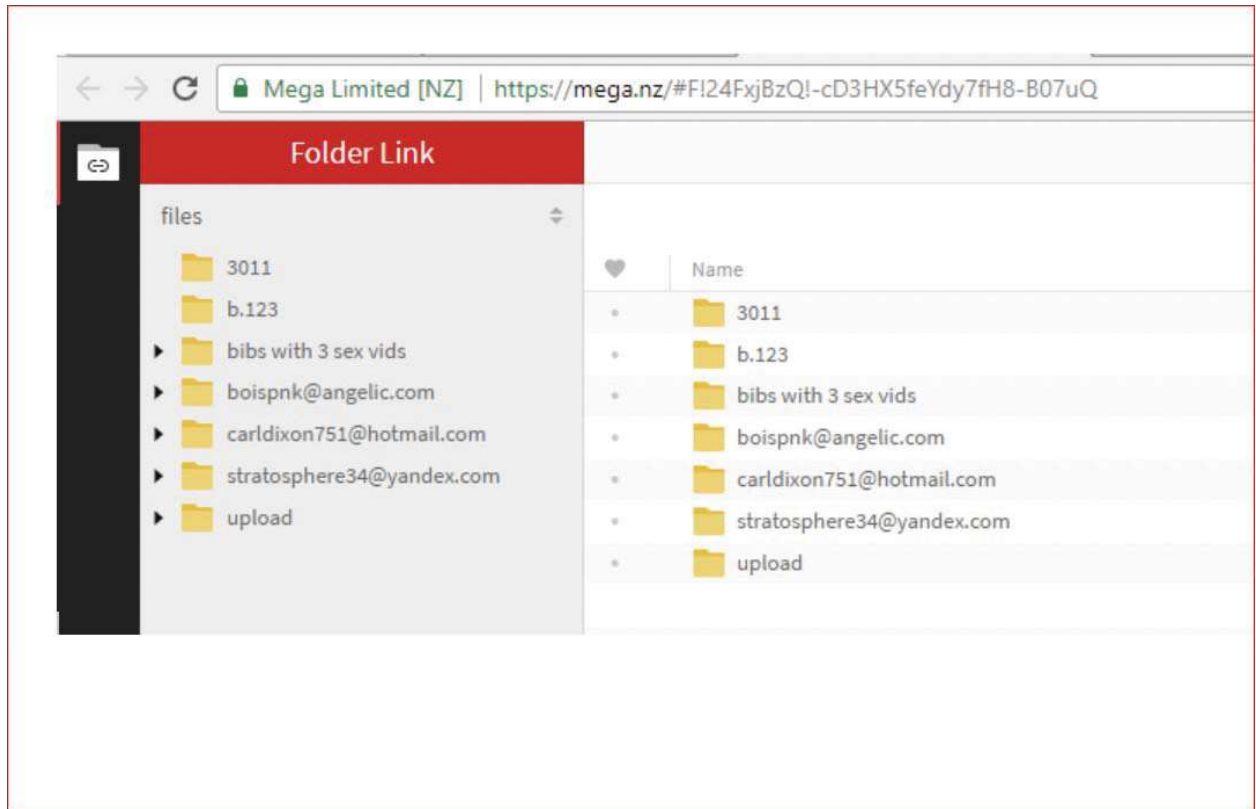
<https://mega.nz/#F!24FxiBzQ!-cD3HX5feYdy7fH8-B07uQ>

Kent investigators accessed the link’s contents and determined it contained numerous sexually explicit images and videos of children and that over 5,000 files were accessible through this link. Kent investigators noted the URL was a shared Mega<sup>1</sup> cloud storage link that had been created on February 21, 2018 21:13:15 (UTC). The Kent investigators

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<sup>1</sup> Mega is a cloud storage and file hosting service offered by Mega Limited, a New Zealand based company. Mega provides remote server space and end-to-end encryption, where users may privately store and share their files. The service is offered through web interface, desktop clients for Windows or Mac, and smartphone apps for Android and iOS. A unique feature offered by Mega is a text and video chat tool, which is also fully encrypted.

viewed and downloaded a sample of the individual files. A screen capture of the sample from the URL, shown below, and its associated contents were provided to HSI by the Kent investigators.



7. Kent investigators learned from Mega Limited that the above-referenced URL link was generated by the user of a Mega account associated with the email address, Still\_a\_Boy@protonmail.com.<sup>2</sup> Kent Police obtained an Internet Protocol (IP) log from Mega Limited connected to the Mega account, Still\_a\_Boy@protonmail.com (the "Suspect Account"). Kent investigators noted two IP addresses that geo-located to the United States:
  - a. **71.184.121.82**: from 03/04/2018 21:14:39 UTC to 04/21/2018 18:39:32 UTC  
 from 02/08/2018 19:04:11 UTC to 02/12/2018 22:17:22 UTC
  - b. **74.104.158.33**: 02/05/2018 from 04:24:26 UTC to 04:27:25 UTC

<sup>2</sup> Protonmail is an open source end-to-end encrypted email service based in Switzerland.

8. Kent referred the investigation to HSI C3 for further dissemination. HSI C3 was also provided the IP information and the downloaded image and video evidence from the sample taken by Kent.
9. On May 11, 2018, HSI C3 issued a summons to Verizon requesting subscriber information associated with the IP address, 71.184.121.82. In its response, Verizon provided the following customer information:  
  
Customer Name: david stgeorge  
Account Address: XX XXXXX XX Arlington, MA<sup>3</sup>  
Account Number: XXXXXXXXXXX6732  
Telephone: XXX-XXX-2906  
Account Creation Date: 04/27/2007
10. HSI C3 disseminated the above investigative information and digital evidence to HSI Boston. On July 9, 2018, I issued a summons to Verizon Internet Services requesting subscriber information associated with IP address 74.104.158.33, as referenced above in Paragraph 7.b. In its response, Verizon provided me the following customer information:  
  
Customer Name: david stgeorge  
Account Address: XX XXXXX XX Arlington, MA<sup>4</sup>  
Account Number: XXXXXXXXXXX 6732  
Telephone: XXX-XXX-2906  
Account Creation Date: 04/27/2007
11. HSI Boston agents reviewed screen captures of the URL link sample (referenced in Paragraph 6) and noted the link opened to multiple folders. HSI Boston agents viewed all of the files in the downloaded folders, all of which had previously been viewed by the Kent investigators, noting the folders collectively contained approximately eighty-three image and video files depicting minor children engaged in sexually explicit conduct.
12. Examples of the image and video files include:

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<sup>3</sup> This is the same address as the SUBJECT PREMISES.

<sup>4</sup> This is the same address as the SUBJECT PREMISES.

- a. **235872357[1].jpg** – this image file, located in the folder titled “3011,” depicts three male children, approximately eight to ten years of age, engaged in sexual activity. The image shows one boy lying on his back with his legs lifted and spread apart with the penis of another boy in his mouth, and a third boy anally penetrating him.
  - b. **12-8yo\_tiaboy\_rape.wmv** – this six minute, eighteen second video file, located in the folder titled “boispnk@angelic.com,” depicts a male child, approximately nine to eleven years of age, sitting on a couch fully unclothed with his wrists handcuffed to his ankles. An adult male appears and puts lotion on the boy’s penis and anus before turning the boy upside down and anally penetrating him.
  - c. **112233.wmv** – this one minute, fifty-seven second video file, located in the folder “stratosphere34@yandex.com” and sub-folder “Downloads,” depicts an approximately one-year-old female child lying fully unclothed while an adult male digitally penetrates her anus and vagina.
13. In June 2018, I requested the Mega IP logs from the Kent Police. On July 11, 2018, I received information concerning the Suspect Account provided to Kent by Mega Limited. According to Mega Limited, the URL link noted above in Paragraph 6 is no longer publicly accessible, having been deleted on April 5, 2018.
14. The account user (Still\_a\_Boy@protonmail.com) was first active on the Mega service on January 17, 2018 and last accessed the service on April 21, 2018. The account user primarily used Firefox Extension on Windows<sup>5</sup> to access the Mega service. IP logs listed date, time, IP address, country, Internet Service Provider (ISP), and proxy<sup>6</sup> status. On four dates in February 2018, logins for the Suspect Account were associated with proxy servers.

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<sup>5</sup> An extension is a small application that adds a new feature or function to a web browser.

<sup>6</sup> A proxy server allows a computer user to go online using a masked IP address.

The remaining logins were associated with the IP addresses listed in Paragraph 7.a. and 7.b.

15. On June 1, 2018, HSI Boston Special Agent Andrew Kelleher queried Massachusetts Registry of Motor Vehicle (RMV) records for David St. George, obtaining the following driver's license information:

David St. George  
Date of Birth: XX/XX/1946  
Address: XX XXXXXX XX Arlington, MA 02474<sup>7</sup>  
Status: Active

16. I later queried RMV records for additional licenses and registrations associated with the SUBJECT PREMISES. Results were negative. RMV registration records for St. George indicate he does not currently own a registered vehicle.
17. Open source queries of David St. George revealed he is the former Artistic Director of the Discovery Ensemble, a Boston-based chamber orchestra that performed concerts in Cambridge, Massachusetts, and held workshops and matinee concerts for children from local schools. Since 2015, St. George has occasionally posted articles to the Boston Philharmonic blog, including reflections on time he spent observing the Boston Philharmonic Youth Orchestra (BPYO) while on tour.
18. In a Boston Philharmonic Youth Orchestra blog post dated September 5, 2018, David St. George was identified as someone who "has built a close personal relationship with the members of the BPYO through his attendance at ... weekly rehearsals, where he frequently intercedes with his insights and coaching."
19. A query of David St. George using the online investigation software, Clear, yielded a matching individual:

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<sup>7</sup> This is the same address as the SUBJECT PREMISES.

David St. George  
Date of Birth: XX/XX/1946 (age 71)  
Possible Address: XX XXXXXX XX Arlington, MA 02474<sup>8</sup>  
Phone Number: (XXX) XXX-2906  
Real Property: XX XXXXXX XX Arlington, MA 02474  
Owner: St George David Trust

No additional residents were listed at the address. A Clear query of the SUBJECT PREMISES yielded no information concerning additional occupants.

20. On July 12, 2018, at approximately 3:25 PM, I conducted surveillance of the SUBJECT PREMISES. No vehicles were in the driveway. A handwritten sign hung on the front door directing all package deliveries be left at the mailbox next to the garage. I observed a mailbox situated outside a breezeway connecting the house to the garage. I observed there were no names affixed to the mailbox. I detected several wireless networks within range of the residence, which were all in a locked mode. Based on my training and experience, I know that persons often lock their wireless networks to prevent unauthorized users from accessing their wireless network. This also informs law enforcement that only limited users have access to the wireless network. In my experience, those accessing a locked wireless network are limited to occupants of the residence and persons known to and/or trusted by the occupants. For a user to gain access to a locked wireless network, the account owner must provide the user with a password.
21. On September 18, 2018, an Arlington Police Detective made a pretext visit to the SUBJECT PREMISES and spoke to David St. George, who said he lived at that address alone.

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<sup>8</sup> This is the same address as the SUBJECT PREMISES.

22. Based on all the foregoing information, I sought and obtained a search and seizure warrant for the SUBJECT PREMISES and the person of ST. GEORGE, which the Honorable Judith G. Dein issued on September 21, 2018.

**B. Execution of the Search Warrants**

23. On September 25, 2018, ICE-HSI personnel executed the search warrants at the SUBJECT PREMISES.
24. ST. GEORGE was present during the search. Agents advised ST. GEORGE of his Miranda rights. He indicated he understood those rights and in writing waived them and agreed to speak with agents. ST. GEORGE admitted to the agents that he had a large collection of child pornography in his home. He told the agents that he had been collecting child pornography over an extended period of time. He admitted to possessing, receiving and distributing thousands of files of child pornography, which he defined as images showing sexual contact with children. He admitted to using the Mega account described above<sup>9</sup> to post and receive child pornography. He also admitted to using the Protonmail account described above, as well as two other Protonmail accounts, to send and receive child pornography and said that he used Protonmail to conceal his identity. ST. GEORGE said he also received and downloaded large amounts of child pornography from the “Dark Web” using the TOR browser.<sup>10</sup>
25. ST. GEORGE told agents that he was collecting child pornography in what he described as a “feverish and crazed” way over a period of about a year and a half and had amassed a large collection. He said he then deleted his collection and erased his Mega account because he became “disgusted” with himself. ST. GEORGE told agents that he recently

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<sup>9</sup> Agents found the Mega application on ST. GEORGE’s iPhone.

<sup>10</sup> Agents found the TOR browser on ST. GEORGE’s laptop computer.



started collecting child pornography again around the spring of this year. He said he would receive emails containing hyperlinks and would download child pornography files from those hyperlinks and then upload them to his Mega account.

26. ST. GEORGE directed agents to a thumb drive he said he used to store child pornography that he had downloaded. Agents found a 512 GB Hyper X thumb drive where ST. GEORGE said it was. Preliminary forensic review of the thumb drive showed that it contained multiple folders. Agents found numerous child pornography files on the thumb drive. One of the folders, titled “Megasync Downloads,” was found to contain the following examples of child pornography::

- a. A file named `htmlimage28.jpeg` – This image depicts a female child approximately 6 – 8 years of age lying on her stomach on a bed. She is fully unclothed from the waist down, and wearing a pink and white striped shirt. Her legs are spread apart, exposing her vagina. This file’s created date is September 3, 2018. Based on my training and experience, I am aware that this created date, and the ones listed below, create a high probability that ST. GEORGE downloaded these files on or about these dates.<sup>11</sup>
- b. A file named `htmlimage30d` – This image depicts the buttocks of a child, approximately 6 – 8 years of age, whose shirt is pulled up around the child’s waist. The size and clothing of the child appear to match that of the female child described above. The erect penis of an adult male is shown penetrating the child’s buttocks. This file’s created date is September 3, 2018.<sup>12</sup>

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<sup>11</sup> This image is available for the Court’s inspection.

<sup>12</sup> This image is available for the Court’s inspection.

- c. A file named (0653).JPG – This image depicts two male children, approximately 8 – 10 years of age, lying fully unclothed on a sofa covered with a striped sheet. One boy is hovering over the other boy, with his penis inside the other boy’s mouth. This file’s created date is September 3, 2018.<sup>13</sup>
  - d. A file named oo00.jpg – This image depicts a male child, approximately 8 – 10 years of age, kneeling before an adult male. The males are fully unclothed. The male child is holding the adult male’s erect penis to his mouth. This file’s created date is September 3, 2018.<sup>14</sup>
27. During the search, agents found a three ring binder containing images of child pornography. These images appeared to be screen shots taken from videos agents found during their preliminary forensic review of the thumb drive.
28. ST. GEORGE told the agents he is employed by both the Boston Philharmonic Orchestra and the Boston Philharmonic Youth Orchestra. He said the latter orchestra includes children between 12 and 21 years of age. ST. GEORGE denied engaging in any sexual contact with children and denied any sexual interest in children apart from looking at child pornography.
29. ST. GEORGE said that he had lived in the SUBJECT PREMISES alone since 2004 and that he had not had any long term guests during the time he had lived there. Agents executing the search found no indication that anyone other than ST. GEORGE is currently living at the SUBJECT PREMISES.

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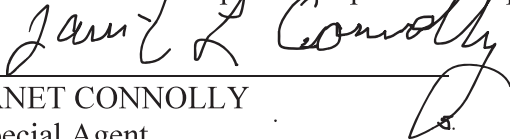
<sup>13</sup> This image is available for the Court’s inspection.

<sup>14</sup> This image is available for the Court’s inspection.

**CONCLUSION**

Based on the foregoing, I submit that there is probable cause to believe that on or about September 25, 2018, DAVID ST. GEORGE did possess child pornography with intent to view in violation of 18 U.S.C. § 2252A(a)(5)(B) and that on or about September 3, 2018, DAVID ST. GEORGE did receive child pornography in violation of 18 U.S.C. § 2252A(a)(2)(A).

Sworn to under the pains and penalties of perjury,


  
\_\_\_\_\_  
JANET CONNOLLY  
Special Agent  
Homeland Security Investigations

**Sep 25, 2018**

SUBSCRIBED and SWORN to before me on September , 2018.

  
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HONORABLE JUDITH G. DEIN  
UNITED STATES MAGISTRATE JUDGE

I have reviewed the still images referenced in paragraph 26 above, and I find probable cause to believe that the images depict minors engaged in sexually explicit conduct. The Affiant shall preserve said images for the duration of the pendency of this matter, including any relevant appeal process.

  
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HONORABLE JUDITH G. DEIN  
UNITED STATES MAGISTRATE JUDGE